

EXHIBIT A



February 25, 2022

VIA ELECTRONIC MAIL

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Re: *In re Facebook, Inc., Consumer Privacy User Profile Litig.*,
Northern District of California Case No. 3:18-md-02843-VC

Dear Counsel:

We write to follow up on our request for documents related to financial systems and files. During the parties' last mediation with Judge Andler and Special Master Garrie on February 14, 2022, we identified seven categories of financial documents we seek, regardless of location, without restriction by custodian. These documents are responsive to a number of Plaintiffs' RFPs, including 14-17, 44-51, 80-84. For your convenience, the categories are set forth below:

- (1) Financial/economic impact of transition to API v1 to v2 and/or Platform 3.0 (or whatever terminology used by Facebook for transition to the new platform in 2014), including, but not limited to impact of deprecating friends and read permissions, and impact of whitelisting apps and partners or creation of private APIs;
- (2) Financial/economic impact of expanding or limiting privacy restrictions (including changing privacy controls available to users), or limiting or expanding access to user data via whitelisting apps and partners;
- (3) Marketing and business plans (including any internal financial plans, presentations, or onboarding materials) related to the valuation/quantification/monetization of Facebook user data;

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- (4) Documents and materials Facebook prepared for any third party re quantification of Facebook data and/or user content and information, including in connection w/ 2012 IPO;
- (5) Documents related to any payments made to third parties for access or use of user data (*e.g.*, Onavo);
- (6) Financial impact of third parties accessing or using FB user content and information in ways that violate FB platform policies (including, but not limited to, *e.g.*, documents supporting Facebook's positions in Rankwave lawsuit in which it valued the amount of data Rankwave was wrongfully obtaining);
- (7) Documents supporting Facebook's public reporting of revenues and FB's, including but not limited to average revenue per user, user engagement, active users, and the information relating to users Facebook made available to third parties to generate those revenues.

We understand that Facebook will be providing Plaintiffs with a production schedule regarding these documents. But we request that Facebook prioritize documents related to categories 1 and 2 above. As Plaintiffs learned for the first time through the deposition of Antonio Garcia-Martinez on Wednesday, February 23, 2022, the monetization and analytics team at Facebook performed revenue impact analyses regarding major product and program initiatives at Facebook. *See, e.g.*, Garcia-Martinez Tr. 260:21-261:6; 263:2-6. As you know, we have been seeking these types of financial documents for over two years. As such, we expect to receive these documents immediately and no later than next Friday, March 4.

Sincerely,



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DK:srs